

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Willie Edward Nichols

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

SECURITAS SECURITY SERVICE

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No. \_\_\_\_\_  
*(to be filled in by the Clerk's Office)*

Jury Trial: ☐ Yes ☐ No  
*(check one)*

RECEIVED  
CLERK, COLUMBIA, SC  
2022 MAY 26 AM 11:11

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Willie Edward Nichols</u>
Street Address	<u>1330 Ross Street</u>
City and County	<u>West Columbia Lexington</u>
State and Zip Code	<u>South Carolina 29169</u>
Telephone Number	<u>(803)603-4938</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>SECURITAS SECURITY SERVICE</u>
Job or Title (if known)	<u></u>
Street Address	<u>800 Columbiana Drive #204</u>
City and County	<u>Irmo</u>
State and Zip Code	<u>SC 29063</u>
Telephone Number	<u>(803)691-9332</u>

**Defendant No. 2**

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>

**Defendant No. 3**

Name	<u></u>
------	---------

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Willie E. Nichols is a citizen of the State of (name) South Carolina.

b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

---

---

---

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

please refer to attached statement and claim

---

---

---

---

---

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

please refer to attached

---

---

---

---

---

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Willie Edward Nichols,

Civil Action No. \_\_\_\_\_

Plaintiff,

v.

Securitas Security Service USA,

Defendants.

I am Willie Edward Nichols Sr., victim of the system call Blacklisting a particular employee hereby make this claim based on the truth on how the seventeen years of employment with Securitas Security occurred based on information filed about me by a Former Employer and Union representatives laboring me, my name and classified me as, (" a smart ass "N".) that situation came about when they terminated my employment while I was on a domestic leave of absence, they blocked all unemployment benefits, not one cent in food stamps would they help me, root little "N" or die was the message, no other employer would hire me, and then I became more victimized when I was brutally beaten down by the city police while looking for work and charged with trespassing.

I relocated in hope that the stigma was behind me, and what was said against me on this blacklisting system wasn't going to continue, seventeen years of service as a professional Security Officer with my present employer Securitas Security Service shows that people will continue to treat you wrongfully just because they don't like you even hate you because of the color of your skin and or disability to do the job the way they want it done.

In May 2004 I began employment with Securitas Security Service, having many years of security experience; it wasn't hard for the manager of Securitas Security at the time to place me in a supervisor position starting pay \$12.00 an hour, "yes I am on my way back", not so fast, the assignment, duties and responsibility at that contracted site needed four officers to maintain, therefore I adjusted and began to work smart not hard as the manager of site won't to see, do to the fact that I have a disability and wasn't jumping up and down to check in and out all of the 150 or more trucks, vendors, and employees and other post function, the site manager forced me off the site. Those actions against my disability of employment weren't right. I was being punished, pay cut from \$12.00 hourly to \$8.50 hourly no more supervisor. Starting back at \$8.50 was a kick down and was held down over the past seventeen years.

Five and a half years of employment with Securitas Security, they laid me off for three months, stating like of work, as I saw them hire, and advertise employment for security officers. I'm called back on duty pay at \$8.00 hourly. They posted me at a site where the then manager of Securitas made a word of month promise, that he was going to get my supervisor position back, yet when the supervisor position became available he promoted a young black female with one year of service with the company over me with about six years with the company and supervisor experience.

Willie Edward Nichols Sr.



Willie Edward Nichols,

Plaintiff,

v.

Securitas Security Service USA,

Defendant,

These acts was wrongfully doing toward me as an employee, and continue to stigmatize my life, while assigned to a site that was coming to and end, I informed HQ, the HR department personal that I was staying with Securitas and seek replacement, now this was three months before the end of the contract, one week before the end of the contract a young white female was assigned to my location, I'm thinking that she was my replacement for me to relation, not so she was offer and granted a site that paid a dollar more than I was making to stay with Securitas she, a young white female placed over me and old black man. In August 2016 they relocated me and my hours of work were cut to part time 5 hours a day, Monday 5 hours, Tuesday 5 hours, Wednesday 5 hours, Thursday 5 hours, and Friday 4 hours, 24 hours a week at \$9.00 an hr. Now 12 years with the company, still \$3.00 less than what I started with, sixteen hours short of a 40 hour week. They cut my hours of work for 3 years and forced me into part time duties; losing all vacation time and other benefits.

August 2019 I'm assigned to a site, Teleperformance is the site where the supervisor violated every core value that Securitas Security Service upholds, Integrity, Vigilance, Helpfulness. From being forced to only 24 hrs a week assignment, to being forced to work 40 hours a week assignment by the supervisor at that site. Because of my age and my disability I informed him that he should only schedule me for 32 hours a week, I attendant church services on Sunday's which gave him more reason to do me wrong, he refused to take me off of a 40 hour schedule, working me on Sundays a day of Worship Services, he also refused to accommodate the officers and me with my disability a chair that has a back to it, I requested for a better seating at the AT&T doorway that we were assigned to monitor, it was a round steel stool with no back, every security officer made a complaint yet nothing was done.

My complaint with Securitas Security Service started when they cut my rate of pay and then not allow me the opportunity to re cope, they continue on treating me like ("a smart ass "n"), a phrase that a former employer blacklisted about me. These civil actions and claims I seek relief from the court. Benefits and pay adjustment from date they were taken from me wrongfully.

Willie Edward Nichols Sr.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May 19, 2022.

Signature of Plaintiff

Printed Name of Plaintiff

Willie Edward Nichols  
Willie Edward Nichols

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address